

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Case No. 4:24-mj-46

Plaintiff,

v.

AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR CRIMINAL  
COMPLAINT

KYLE DEAN BULT,

Defendant.

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STATE OF SOUTH DAKOTA     )  
  :ss  
COUNTY OF MINNEHAHA     )

I, Nathan Anderson, Special Agent with Homeland Security Investigations (HSI), and currently assigned to the Sioux Falls, South Dakota Resident Agent in Charge (RAC) Office, being duly sworn, states as follows:

1. I have been a Special Agent (SA) with HSI since March 2020.
2. During my law enforcement career, I have become familiar with the *modus operandi* of persons involved in violations of federal law relating to 18 U.S.C. § 2422, Coercion and Enticement of a Minor (and attempts to do so), in violation of federal law. Based on my experience and training, I am knowledgeable of the various means utilized by individuals who illegally attempt to meet with children in order to engage in criminal sex acts.
3. The information set forth below is based upon my knowledge of an investigation conducted by the South Dakota Internet Crimes Against Children Task Force (ICAC) and the investigation of other law enforcement agents and

officers including, but not limited to, South Dakota Division of Criminal Investigation (DCI), HSI, the Sioux Falls Police Department, and the Minnehaha County Sheriff's Office. I have not included every fact obtained pursuant to this investigation but have set forth those facts that I believe are essential to establish the necessary probable cause for the criminal complaint. I have not omitted any material fact relevant to the consideration of probable cause for a criminal complaint against the above-named defendant.

4. I have been informed that 18 U.S.C. § 2422(b) makes it a crime for a person to use any means of interstate commerce, to attempt to knowingly persuade, induce, entice, and coerce a person who has not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a crime.

5. I respectfully submit that there is probable cause to believe that Kyle Dean BULT committed the crime of Attempted Enticement of a Minor in violation of 18 U.S.C. § 2422(b).

6. On March 9, 2024, Minnehaha County Sherriff's Office Detective Travis Stauffacher was acting in an undercover (UC) capacity, using the persona of a 15-year-old female, hereafter the UC Persona, to conduct a conversation with Kyle Dean BULT via the application (app) Taimi, which is an online social media platform headquartered in Las Vegas, Nevada.

7. During the conversation, BULT was told that the UC Persona was 15 years of age. After being told of the UC Persona's age, BULT engaged in further conversations, sexual in nature, during which BULT expressed interest in

engaging in sexual activity with the UC Persona. BULT stated multiple times that he was interested in engaging in sex with the UC Persona.

8. BULT agreed to meet the UC Persona at an agreed upon location in Sioux Falls, South Dakota, and later arrived at the location on March 10, 2024, at approximately 8:21 PM. BULT was subsequently arrested and brought into custody.

9. During a post-Miranda interview, BULT admitted to meeting the UC Persona on Taimi, engaging in conversation that was sexual in nature, and agreeing to meet the UC Persona in person for the purposes of engaging in sexual activity. BULT provided his phone number of 605-941-6095, which was the same number utilized communicate with the UC Persona.

10. BULT is a previously registered sex offender in the state of South Dakota.

#### CONCLUSION

11. I submit that there is probable cause to believe that Kyle Dean BULT committed a violation of 18 U.S.C. § 2422(b), Attempted Enticement of a Minor Using the Internet, in that, BULT knowingly persuaded, induced, enticed, or coerced an individual who had not yet attained 18 years of age, to engage in sexual activity with a minor female, for which the defendant could be charged with a criminal offense, namely, criminal sexual conduct in violation of South Dakota Codified Law (SDCL) § 22-22-1(5), Rape in the Fourth Degree, and SDCL

§§ 22-22-7 and 22-22-7.1, Felony Sexual Contact with a Child Under 16, all in violation of 18 U.S.C. § 2422(b).

Wherefore, I request the issuance of a criminal complaint and arrest warrant for the arrest of Kyle Dean BULT.

Dated this 11<sup>th</sup> day of March, 2024.



Nathan Anderson, Special Agent  
Homeland Security Investigations

Sworn to and subscribed to me, telephonically, on the 11<sup>th</sup> day of March, 2024, at Sioux Falls, South Dakota.



VERONICA L. DUFFY  
United States Magistrate Judge